



April 3, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Communication in WC Docket Nos. 09-197 and 11-42

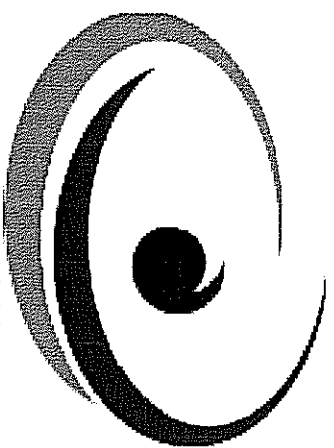
Dear Ms. Dortch:

On March 28, 2013, the undersigned counsel for Prepaid Wireless Retail, LLC, d/b/a Odin Mobile, met with Kimberly Scardino, Michelle Schaefer and Alex Minard of the Wireline Competition Bureau's Telecommunications Access Policy Division, as well as Trent Harkrader from the front office of the Wireline Competition Bureau, to discuss Odin Mobile's Compliance Plan, filed so that it can avail itself of the Commission's conditional grant of forbearance in the *Lifeline Reform Order*.

At the meeting, we discussed Odin Mobile's Compliance Plan, pricing and affiliated companies. Attached is a presentation provided to the staff.

Respectfully,

Robert Felgar
General Counsel of
Prepaid Wireless Retail



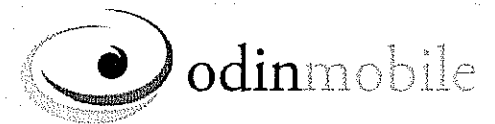
odimobile

Presentation by Robert Felgar

March 28, 2013

The Challenge

- The gap between the visually impaired and the general population is large:
 - 42% of BVA members do not use a cell phone at all (compared to 12% for the general population).
 - Only 15% of those who use a cell phone, use it for texting (72% for general population)
 - Only 11% of those who use a cell phone use it for email (50% for general population)

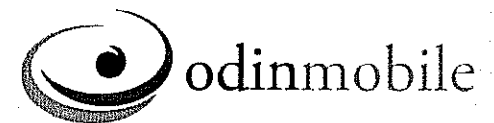


The Challenge

- The causes of low adoption rates include cost and lack of accessibility.
 - As of 2008, only approximately 43% of non-institutionalized persons with a visual disability, ages 16-64, were employed.
 - As of 2009, 32% of blinded veterans live on less than \$20,000 per year.

The Solution

- A variety of accessible handsets. Basic devices and smart devices.
- Training and great customer support. Customers need to be educated on the use of their device.
- Cost
 - we will urge partners to provide services and handsets to low income (those who qualify for Lifeline) blind persons at a significant discount. Partners may include audible.com (an Amazon company), Huawei, Emporia and T-Mobile.
 - Lifeline.



The Original Intent

- In Federal-State Joint Board on Universal Service, 12 FCC Rcd 87776 (1997), the Commission required states that provide intrastate matching funds to base eligibility criteria solely on income or factor directly related to income. The Commission did this “to prohibit states from limiting Lifeline to only those low-income consumers who are elderly or have disabilities.” Federal-State Joint Board on Universal Service, 13 FCC Rcd 1, 2 (1997).
- Today, a significant segment of the original intended beneficiaries of Lifeline cannot benefit from the program.

